

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

Case No. 19-md-2875-RBK
MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

This Document Relates to All Actions

**JOINT STIPULATION REGARDING DISMISSAL OF RITE AID
CORPORATION AND WALGREEN CO. FROM THE MEDICAL
MONITORING MASTER COMPLAINT**

WHEREAS, Plaintiffs have named Rite Aid Corporation (“Rite Aid”) and Walgreen Co. (“Walgreens”) as defendants in the Consolidated Third Amended Medical Monitoring Class Action Complaint, ECF 1709 (“Medical Monitoring Master Complaint”);

WHEREAS, on December 22, 2021, putative medical monitoring class representative Kenneth Berkson voluntarily dismissed his case, ECF 1829;

WHEREAS, on December 22, 2021, putative medical monitoring class representative Roland Butler voluntarily dismissed his case, ECF 1831;

WHEREAS, with the dismissal of Plaintiffs Berkson and Butler, none of the putative medical monitoring class representatives filled an at-issue prescription at either Rite Aid or Walgreens; and

WHEREAS, Plaintiffs will stipulate to the voluntary dismissal of Rite Aid and Walgreens from the Medical Monitoring Master Complaint.

It is hereby STIPULATED AND AGREED by and among the undersigned counsel as follows:

1. Plaintiffs will dismiss Rite Aid and Walgreens from the Medical Monitoring Master Complaint.
2. This dismissal shall be without prejudice, with each party to bear its own attorneys' fees and costs.

IT IS SO STIPULATED.

DATED: January 18, 2022

By: /s/ Adam Slater
Adam Slater
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DATED: January 18, 2022

By: /s/ Rebecca Bazan
Rebecca Bazan
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DATED: January 18, 2022

By: /s/ Sarah Johnston

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[PROPOSED] ORDER

AND NOW, on this _____ day of _____ 2022, upon consideration of the attached Stipulation, which applies to Civil Action No. 19-md-2875, it is hereby **ORDERED** that the Stipulation is **APPROVED** and Rite Aid Corporation and Walgreen Co. are hereby dismissed from the Medical Monitoring Master Complaint without prejudice, with each party to bear its own attorneys' fees and costs.

It is so **ORDERED**.

Dated: _____

Hon. Robert B. Kugler